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6	Attorneys for Defendant ANTHONY COATES			
7				
8	IN THE UNITED STATES DISTRICT COURT			
9	FOR THE EASTERN DISTRICT OF CALIFORNIA			
10		No. 2:24-cr-00122-JAM		
11)	JLATION AND ORDER TO CONTINUE		
12) []	US CONFERENCE AND EXCLUDE TIME		
13)	August 20, 2024		
14	Time:	9:00 A.M.		
15		Hon. John A. Mendez		
16	IT IS HEREBY STIPULATED and agre	eed by and between United States Attorney Phillip		
17	A. Talbert, through Assistant United States Attorney Haddy Abouzeid, counsel for Plaintiff; and			
18	Federal Defender Heather Williams, through A	Federal Defender Heather Williams, through Assistant Federal Defender Christina Sinha, counsel		
19	for Mr. Coates, that the status conference, currently set for August 20, 2024, may be continued to			
20	September 17, 2024, at 09:00 a.m., with time between the dates excluded, as detailed below.			
21	The parties specifically stipulate as follo	ows:		
22	The indictment in this case was	filed on May 16, 2024. Dkt. No. 12.		
23	2. The defense received a discov	2. The defense received a discovery production the following day of 149 items		
24	consisting inter alia of law enforcement reports, video recordings, phone records.			
25	3. The defense is seeking a mod	lest, one-month continuance. Defense counsel		
26	represents that she requires addit	ional time to analyze the above discovery, conduct		
27	the defense's investigation, expl	ore potential resolutions, and otherwise prepare for		
28	3			

trial. She believes that failure to grant the requested continuance would deny her the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

- 4. The government does not object to the continuance.
- 5. Therefore, the parties stipulate that the ends of justice served by granting the continuance outweighs the best interest of the public and Mr. Coates in a speedy trial, and respectfully request the Court so to find. For the purpose of computing time under 18 U.S.C. § 3161 et seq. (the Speedy Trial Act), the parties request that the time period between August 20, 2024 and September 17, 2024 (inclusive) be deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(B)(iv) (Local Code T4), because it would result from a continuance granted by the Court at the defense's request, based on a finding that the ends of justice served by granting the continuance outweighs the best interest of the public and Mr. Coates in a speedy trial.

The parties therefore respectfully request this Court to adopt the parties' stipulation as its Order.

Respectfully submitted,

HEATHER E. WILLIAMS
Federal Defender

Date: August 13, 2024

/s/ Christina Sinha
Assistant Federal Defender
Attorneys for Defendant
ANTHONY COATES

Date: August 13, 2024

PHILLIP A. TALBERT
United States Attorney

/s/ Haddy Abouzeid

Assistant United States Attorney
Attorneys for Plaintiff

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2	<u>ORDER</u>	
3	The Court, having received and considered the parties' stipulation, and good cause	
4	appearing therefrom, ADOPTS the parties' stipulation in its entirety as its order.	
5	IT IS SO ORDERED.	
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7	Dated: August 14, 2024	/s/ John A. Mendez
8		THE HONORABLE JOHN A. MENDEZ
9		SENIOR UNITED STATES DISTRICT JUDGE
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